UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)		
)		
vs.)	NO.	04-30046 MAP
)		
ANTHONY MATOS)		

MOTION TO MODIFY CONDITIONS OF BOND

Now comes the defendant, by and through counsel, and respectfully requests this Honorable Court modify the defendant's existing conditions of bond to permit the sureties, Lawrence E. Hanna, Jr., and Gina J. Hanna, to be discharged and to permit the withdrawal of their real estate as surety, all other conditions of bond to remain the same.

Counsel for the defendant has conferred with AUSA William Welch who does not oppose the allowance of this motion.

THE DEFENDANT,

BY: /s/ Vincent A. Bongiorni, Esq. 95 State Street, Ste 309 Springfield, MA. 01103 (413) 732-0222 BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorni, Esq., do hereby certify that I have served a copy of the foregoing to the Assistant United States Attorney, William Welch, Esq., United States District Court, and Irma Zignorelli, Pretrial Services, 1550 Main Street, Springfield, MA. 01103 this 26 day of June 2006.

/s/ Vincent A. Bongiorni